

ABELSON & TRUESDALE, LLC

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Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

JOSEPH & RUTH CARRANO

Debtors

Case No. 16-22887 (MBK)

Chapter 13

**MOTION TO ENFORCE CHAPTER 13
PLAN, COMPEL ALLOCATION OF
MORTGAGE PAYMENTS, PAYMENT OF
PROPERTY TAXES, INSURANCE AND
DAMAGES PER 11 U.S.C. § 524(i)**

Hearing Date: **January 2, 2018 @ 10:00 A.M.**

To: Clerk, United States Bankruptcy Court
United States Bankruptcy Court
402 E. State Street
Trenton, New Jersey 08608

Albert Russo, Trustee
CN 4853
Trenton, NJ 08650

Twp. Of Lacey
818 West Lacey Road
Forked River, NJ 08731
Attn: Tax Collection

Kondaur Capital Corp
333 S. Anita Drive, Suite 400
Orange, CA 92868
*Attention: Officer, Director,
Managing Agent or Other
Individual Authorized to Accept
Service of Process*

Ocean First Bank.
975 Hooper Avenue
Toms River, NJ 08753
*Attention: Officer, Director,
Managing Agent or Other
Individual Authorized to Accept
Service of Process*

Neal M. Ruben, Esq.
179 Avenue at the Common
Suite 201
Shrewsbury, NJ 07702
Attorney for Ocean First

PLEASE TAKE NOTICE that on January 2, 2018 at 10:00 in the forenoon, or as soon

as counsel may be heard, the undersigned attorney for the Debtors, Joseph & Ruth Carrano will move before the UNITED STATES BANKRUPTCY COURT, Honorable Michael B. Kaplan, presiding, 402 E. State Street, TRENTON, NEW JERSEY, 08608 for an Order Enforcing the Terms of the Chapter 13 Plan, Compelling Proper Allocation of Mortgage Payments, Compelling Payment of Property Taxes, and damages for the Creditor's failure to comply with 11 U.S.C. § 524(i).

PLEASE TAKE FURTHER NOTICE that Debtor shall rely upon the attached certification in support of the application and that pursuant to Local Rule 9013-1, it is submitted that no brief is necessary as issues presented are clear and concise, oral argument is not requested and a proposed form of order is submitted herewith.

/s/ Steven J. Abelson
STEVEN J. ABELSON, ESQ.
Attorney for Debtors

Dated: December 5, 2017